



Report No. 25-1271

Prepared for Crenshaw, Ware & Martin, P.L.C.

In the Matter of

COEYMANS MARINE TOWING, LLC D/B/A CARVER MARINE TOWING

as Owner and Operator of

M/T Mackenzie Rose, (IMO No. 8968765)

her cargo, engines, boilers, tackle, equipment, apparel, and appurtenances, etc., *in rem*, ("M/T MACKENZIE ROSE"), petitioning for Exoneration from or Limitation of Liability in allision with Norfolk and Portsmouth Belt Line Railroad Company Main Line Railroad Bridge (the "Bridge") occurring June 15, 2024 in and about the Elizabeth River, Virginia. U.S. District Court, Eastern District of Virginia, Civil Action No: 2:24-cv-00490



MACKENZIE ROSE

(Photo – Marine Traffic 4.22.2025)

Report – August 8, 2025

PMC LLC

998C Old Country Road No.183, Plainview New York 11803

EXHIBIT 2



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2.0 INTRODUCTION

At the request of James Chapman of Crenshaw, Ware & Martin, P.L.C., this report has been compiled to review and opine upon the value of the tug MACKENZIE ROSE as of June 15, 2024. This includes a rebuttal of the valuation opinion rendered in the Meyerrose and Co., Inc., report No. M-14469 dated July 7, 2024, authored by Jason Meyerrose.

2.1 Case Background & Claim¹

On June 15, 2024, the tug MACKENZIE ROSE caused an allision with the Belt Line's Main Line Railroad Bridge that spans the Southern Branch of the Elizabeth River between Norfolk and Portsmouth, Virginia.

The allision occurred when the tug was pushing a 200-foot long loaded barge and struck the Bridge well outside the navigable channel well behind the fender system with significant force that heavily damaged the steel superstructure.

The force of the allision resulted in severe damage being sustained, rendering the Bridge completely unusable.

Following the incident, the convoy departed for New York without notification to Belt Line, the U. S . Coast Guard, or any other authority.

To date, the bridge repairs costs are in excess of USD 15 million.

Petitioner's Complaint seeks to limit its liability to USD 2. 5 million and has posted security in that amount.

The USD 2.5 million figure is derived from the Meyerrose and Co., Inc report No. M-14469 dated July 7, 2024.

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<sup>1</sup> Compiled from the Court filing; Case 2/24-cv-00490-MSD-LRL Document 25



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### 3.0 PARTICULARS OF THE VESSEL

The MACKENZIE ROSE is a towing tug with the following reported principal particulars:-

|                 |   |                                                             |
|-----------------|---|-------------------------------------------------------------|
| Type            | : | Towing Vessel; Coastwise, Unrestricted: Subchapter M        |
| Registry        | : | USA                                                         |
| IMO No.         | : | 8968765                                                     |
| Official Number | : | 1098224                                                     |
| Classification  | : | USCG Inspected                                              |
| Built           | : | 2000 by Sea Boats Inc., Fall River, Massachusetts           |
| Previous Names  | : | VERNON C; MARY GELLATLY                                     |
| Net Tonnage     | : | 107                                                         |
| Gross Tonnage   | : | 157                                                         |
| Length Overall  | : | 96.4'                                                       |
| Breadth         | : | 33.5'                                                       |
| Depth           | : | 17.9'                                                       |
| Fuel Capacity   | : | 56,000 gal.                                                 |
| Propulsion      | : | Alco (2) 12-251E diesel engines 4,500 BHP total, twin screw |
| Owners          | : | Coeymans Marine Towing LLC d.b.a. Carver Marine Towing Inc  |

Access to the tug for survey was not provided by the Owners.

Based on survey of similar tugs by the same builder and reports made available and noted in section 5.0 of this report, the tug's general arrangement consists of the deckhouse set forward on the hull main deck and extending aft thru midships.

On the foredeck are a centerline bull nose atop the forward bulwark and bitts port and starboard.

The foredeck transitions aft into port and starboard side decks to the aft winch / work deck.

The tug has an upper and lower pilot house each fully equipped for integrated tug & barge operation from either location depending upon navigational circumstances & barge drafts.



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Electronic and navigation equipment reportedly includes:-

- a) VHF – (3) radio sets
- b) 3 GPS Units
- c) 1 AIS Transponder
- d) 3 Radar & Scanners
- e) PC's, 1 printer
- f) 2 Anemometers (Wind Birds)
- g) LCD Monitors
- h) 2 Depth Sounders / Plotters
- i) 3 Spotlights
- j) 2 Autopilots

The superstructure is constructed with three (3) levels with a raised (approximately 30') upper pilot house.

Below the lower pilothouse is the accommodation with Captain's quarters with water closet. Continuing below on the next deck level is two (2), 2-man quarters forward, with a water closet.

On the main deck level is a galley to port & mess area to starboard with tables and bench seats.

Aft of the galley is a single interior door giving access to the fidley and then the aft main / work deck.

On the aft deck is the towing winch and bitts.

The main deck is enclosed by solid bulwarks, fitted with ample freeing ports.

The upper deck levels are enclosed by 36" high, double safety rails.

The tug has evidently been maintained to a standard under the current ownership that would not detract from its value.

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4.0 CREDENTIALS

The credentials of the undersigned, with respect to rendering an opinion in this matter are as follows²:

- 4.1 50 years of industry-gained knowledge & experience applied to the provision of marine engineering, surveying & consulting services worldwide. Senior management roles held for 25-plus years, developing & overseeing worldwide multi-disciplined surveying & consulting operations, quality control & dispute resolution. Engaged in pre-purchase, condition assessment and valuation surveys and provision of capital investment estimates.
- 4.2 Oversight and analysis of technical and financial aspects of major repairs to vessels of all types.
- 4.3 Investigative field work & forensic casualty investigation periodically generating written & oral expert testimony rendered in the U.S. and internationally.
- 4.4 Senior managerial oversight of worldwide surveying and consulting operations for major surveying organizations.
- 4.5 As head of the surveying and technical entity³ of an International Group P&I Club, over several years, compiled a database of vessel sales from weekly intelligence provided by a U.S. S&P broker and appraiser, utilizing such information to assist with provision of values of comparable vessels to the P&I Club for limitation of liability purposes.
- 4.6 Past member of the Ship Technical Committee of the International Group of P&I Clubs
- 4.7 Master of Science Degree (MSc) in Maritime Studies from the University of Portsmouth, UK.
- 4.8 United Kingdom Department of Transport (DOT) Class One Certificate of Competency, Marine Engineer - Unlimited Horsepower. .
- 4.9 Registered as a Chartered Engineer CEng. and Chartered Marine Engineer (CMarEng)
- 4.10 Fellow of the Institute of Marine Engineering, Science and Technology (FIMarEST)
 - ~ Active Member, IMarEST Ship Energy & Environment Committee.
 - ~ Active Member, IMarEST Human Element Working Group Committee.
- 4.11 Qualifications Summary:
 - Master of Science (MSc) Degree, Maritime Studies, University of Portsmouth, UK
 - UK DOT Class One Certificate of Competency Marine Engineer, Unlimited Horsepower
 - National Diploma in Marine Engineering with Endorsements

² Career details and qualifications are given in my C.V., forming Appendix A to this report.

³ Atlantic Marine Associates (AMA), a company of the Eagle Ocean Group which includes Shipowners Claims Bureau (SCB), Managers of the American P&I Club.



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- Chartered Engineer, the UK Engineering Council
 - Chartered Marine Engineer (CMarEng), the UK Engineering Council & the Institute of Marine Engineering Science & Technology (IMarEst)

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## 5.0 DOCUMENTATION

Documentation reviewed in this case included the following and insofar as it relates to the determination of an opinion in the case under review, is relied upon in the compilation of this report and the opinions contained herein.

| No.  | Item                                                                                                         | Document Date |
|------|--------------------------------------------------------------------------------------------------------------|---------------|
| 5.01 | General Index or Abstract of Title - 1098224                                                                 | 01/01/2001    |
| 5.02 | BNB Bank - Commercial Approval Memorandum                                                                    | 11/09/2018    |
| 5.03 | DLS Marine Survey & Appraisal - Report Summary Survey Report No. 2049-01V20                                  | 01/21/2020    |
| 5.04 | MI-RO Machinery Corp. - Desktop Assessment of Tugboat                                                        | 03/30/2020    |
| 5.05 | BNB Bank Commercial Approval Memorandum                                                                      | 10/14/2020    |
| 5.06 | GMD Shipyard Order - Drydock                                                                                 | 07/27/2021    |
| 5.07 | Markey Machinery Company, Inc. - SIL # A3981                                                                 | 08/10/2021    |
| 5.08 | Breco International, Inc.                                                                                    | 08/17/2021    |
| 5.09 | Breco International - Invoice No. 11175                                                                      | 08/18/2021    |
| 5.10 | Breco International, Inc. - Delta Costs to Date From 08/10/2021 - 08/20/2021                                 | 08/20/2021    |
| 5.11 | JonRie InterTech, LLC - Invoice No. J3774                                                                    | 08/31/2021    |
| 5.12 | Breco International - Invoice No. 11195                                                                      | 09/07/2021    |
| 5.13 | Breco International - Invoice No. 11254                                                                      | 09/30/2021    |
| 5.14 | Breco International - Invoice No. 11255                                                                      | 09/30/2021    |
| 5.15 | JonRie InterTech, LLC - Invoice No. J-3820                                                                   | 11/02/2021    |
| 5.16 | Marine Safety Consultants, Inc. - Condition & Valuation Survey Report - File No. 21-0992                     | 12/06/2021    |
| 5.17 | MI-RO Machinery Corp. - Desktop Opinion of Tugboat MACKENZIE ROSE                                            | 12/27/2021    |
| 5.18 | First Preferred Ship's Mortgage - Official No. 1098224                                                       | 02/22/2022    |
| 5.19 | Chattel Mortgage - Equipment Financing Agreement                                                             | 02/24/2022    |
| 5.20 | Correspondence from Alan C. Polacek, Esq - Donovan LLP                                                       | 05/24/2022    |
| 5.21 | Carver Marine Towing - Marine Equipment & Services Rates - Barge Transport from Staten Island to Norfolk, VA | 06/05/2024    |
| 5.22 | Meyerrose and Co., Inc. - Inspection Report - File No. M-14469                                               | 07/07/2024    |
| 5.23 | Meyerrose and Co., Inc. - Inspection Report - File No. M-14905                                               | 04/01/2025    |
| 5.24 | Complaint for Exoneration from or Limitation of Liability                                                    | 08/07/2024    |
| 5.25 | Jason R. Meyerrose Affidavit of Valuation of Vessel                                                          | 07/29/2024    |
| 5.26 | Meyerrose and Co., Inc. - Jason R. Meyerrose - Professional Experience                                       | -             |





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| No.  | Item                                                                                                                                                    | Document Date           |
|------|---------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------|
| 5.27 | Carver Marine's Identification of Expert Witnesses - Civil Action No. 2:24-cv-00490                                                                     | 06/04/2025              |
| 5.28 | Clyde & Co - Letter Re Meyerrose Expert Disclosure                                                                                                      | 07/09/2025              |
| 5.29 | Carver Marine's - Identification of Expert Witnesses                                                                                                    | -                       |
| 5.30 | Helm - Daily Log Mackenzie Rose                                                                                                                         | 01/01/2024 - 09/15/2024 |
| 5.31 | Evanston Insurance Company Answer to Complaint                                                                                                          | 12/05/2024              |
| 5.32 | Claim of Evanston Insurance Company, a/s/o Norfolk and Portsmouth Belt Line Railroad Company                                                            | 12/05/2024              |
| 5.33 | Answer and Affirmative Defenses of Claimant / Respondent NPBL                                                                                           | 12/05/2024              |
| 5.34 | Claim by Norfolk and Portsmouth Belt Line Railroad Company Pursuant to Supplemental Federal Rule F(5) in Relation to Main Line Railroad Bridge Allision | 12/05/2024              |
| 5.35 | Subpoena to Dime Community Bank, Hauppauge, NY to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action      | 04/14/2025              |
| 5.36 | Marcon Tug Market Reports                                                                                                                               | Various                 |
| 5.37 | Tug Brokerages Market Sales Reports 2024                                                                                                                | Various                 |

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6.0 OBSERVATIONS, FACTS CONSIDERED & VALUATION APPROACHES

- 6.1 The Meyerrose and Company report No. M-14469 of **July 7, 2024**, is absent any referenced supporting materials for the values stated therein and does not elaborate on methodology applied to the provision of the values rendered. The report gives the tug a then current value of **USD 2.25 to USD 2.5 Million** with a replacement value of **USD 9.0 Million**.
- 6.2 The Meyerrose and Company report No. M-14905 of **April 1, 2025**, is also absent any referenced supporting materials for the values stated therein, nor does it elaborate on methodology applied to the provision of the values rendered. This report gives the tug a current value of **USD 4.5 to USD 5.0 Million** with a replacement value of **USD 12.0 Million**.
- 6.3 There is no indication in the reports as to the reasoning behind the vast change in valuations over the approximate 10 month intervening period.
- 6.4 According to Marcon's⁴ May 2024 Tug Market Report on a total of 5,137 tugs tracked, 242 were officially for sale worldwide, down 23.42% from 2023. Of these, 72 tugs were for sale in the U.S., down from 89 in 2023. The average age of tugs for sale was 33 with new buildings or tugs under construction comprising only 10.74% of those for sale. 62% of tugs for sale were conventional twin screw.
- a. Market Size & Growth: The global tugboat market was valued at USD 533.6 million in 2024, with projections to reach USD 1.1 billion by 2032, growing at a compound annual growth rate (CAGR) of 9.6%. In the global market, the U.S. remains a significant player, especially in second-hand and resale markets.
 - b. Market Dynamics: Demand drivers are expansion of ports and increased maritime trade,
 - c. Challenges: High cost of new tugboats and aging fleets.
 - d. Trends: A shift toward automation and more efficient propulsion systems.
- 6.5 Based on Marcon's report and my knowledge of the tug market, it is apparent that the cost of new construction has buoyed the secondhand tonnage market, increasing the average age of tugs in service and raising the median value in sale and purchase transactions.
- 6.6 In 2024, PMC carried out 17 condition and valuation surveys of vessels for insurance or pre-purchase purposes. In researching comparable tugs, tugs with the principal particulars in the table, Fig.1 below were offered for sale in 2024.

⁴ Marcon; A leading U.S. based Sale & Purchase Brokerage, produces an authoritative statistical publication.



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Year Built	Length (ft)	Horsepower	Price USD
1970	112	4100	2.2 M
2011	120	4750	6.2 M
2005	120	4800	5.5M
2011	120	4750	6.2 M
2006	105	2500	2.1 M

Figure 1

We are often made aware of tug values in our casualty work especially when significant damages are sustained. The table, Fig.2 below shows known insured values of tugs of similar configuration familiar to PMC.

Year Built	Length (ft)	Horsepower	Ins. Value USD
2010	67	1500	2.5 M
1994	100	3000	3.5 M
1973	117	3900	2.0 M
2006	111	5000	6.75 M
2004	95.7	4200	5.18 M

Figure 2

- 6.7 Maintenance of the MACKENZIE ROSE by the Owners places the tugs value in the upper percentile range of values for a tug of its age, size, configuration, outfitting, horsepower, bollard pull and general capabilities.
- 6.8 Comparable Sales Approach
Based on the foregoing valuation information of comparable vessels and the apparent condition of the MACKENZIE ROSE on June 15, 2024, I estimate that its value then was USD 4.0 Million.
- 6.9 Replacement Cost Approach
I estimate the replacement cost in 2024 to be USD 14.0 Million, supported by known tug construction costs in 2024. By applying a reasonable depreciation factor of 70% over its life to account for age and market changes a value of USD 4.2 Million is derived, which supports the comparable sales value.
- 6.10 Generated Income Approach
Typical utilization of a tug of the MACKENZIE ROSE's specification is around 85% with daily hire rates in the region of USD 8,500.00, which if realized will generate an annual income stream of USD 2,640,000. Estimating net income at 20% and applying a typical market governed capitalization rate of 12% indicates a valuation based on net operating income of USD 4.4 Million, which again supports the comparable sales value.



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7.0 OPINIONS

- 7.1 As observed above, Meyerrose and Company report No. M-14469 of July 7, 2024, does not elaborate on the methodology applied to the provision of the values rendered. In any event, I am unable to agree with the figures presented.
- 7.2 The definition of fair market value is generally accepted as *"the estimated price at which the vessel would change hands between a willing buyer and willing seller, neither being under any compulsion to buy or sell and both fully aware of the facts as of the date of valuation"*. In my opinion, based upon a reasonable degree of professional certainty, the estimated market value of the tug MACKENZIE ROSE as of June 15, 2024, was USD 4.0 Million, based upon the application of the comparable sales, replacement cost and income approaches to valuation.
- 7.3 My opinion, to a reasonable degree of professional certainty is based upon my expertise in vessel valuation, derived from my education, training, experience & knowledge gained over 50 years in the maritime industry.
- 7.4 The foregoing is based on the information and documentation available at the time of writing. The Undersigned reserves the right to amend the opinion contained herein, should additional probative information or evidence become available.
- 7.5 I am aware of the requirement of Rule 26 of the Federal Rules Of Civil Procedure: General Provisions Regarding Discovery; Duty of Disclosure.

John S. Poulson MSc
CEng. CMarEng. FIMarEST.
Chief Surveyor | CEO

Attachments

- A. Curriculum Vitae John Stanley Poulson
- B. Prior testimony in the past 4 years.

This report is intended for the sole use of the person or organization to whom it is addressed and no liability of any nature whatsoever shall be assumed to any other party in respect of its contents. As to the addressee, neither the Company nor the undersigned shall be liable for any loss or damage whatsoever suffered by virtue of any act, omission or default (whether arising by negligence or otherwise) by the undersigned, the Company or any of its servants.



John S. Poulson Curriculum Vitae

OVERVIEW

Applying over 45 years of industry-gained knowledge & experience to the provision of marine engineering, surveying & consulting services worldwide. Senior management roles held for 25-plus years, developing & overseeing worldwide multi-disciplined surveying & consulting operations, quality control & dispute resolution.



Providing independent surveying & consulting services worldwide. Effecting investigative field work & forensic casualty investigation, providing written & oral expert testimony in several jurisdictions in the U.S. & internationally:

- Complex vessel & power plant casualties, machinery failure investigation & analysis.
- Fuel quality investigation.
- Fire damage investigation, cause & origin.
- Groundings, collisions & sinkings.
- Oversight & analysis of technical & financial aspects of major repairs to vessels of all types.
- Shipyard & repairers liability surveys.
- Analysis of damages to fixed & floating objects.
- Loss prevention surveys & risk engineering.
- Towage & voyage approval surveys.
- Pre-purchase, condition & valuation surveys & capital investment estimates.
- On-hire & off-hire surveys.
- Personal injury investigation.

Serving: Underwriters, Owners, Attorneys, Brokers, Charterers, P&I clubs, Yacht Owners, Adjusters, Banks & Financiers, Ship Builders & Repairers.

Career Timeline

- **Poulson Marine Consultants (PMC) LLC** Chief Surveyor & CEO 2021 to Date
- **Atlantic Marine Associates, New York** Director | Chief Surveyor 2012 – 2021
- **GL Noble Denton, New York, NY** President, Marine Casualty Investigation 2007 - 2012
- **SCB, Managers, American P&I Club** Director | Principal Surveyor, Technical 2005 - 2007
- **BMT Salvage Ltd (the SA), New York** Regional Manager for the Americas 2001 – 2005
- **The Salvage Association New York** Staff Surveyor 1992 – 2001
- **The Salvage Association, Antwerp** Staff Surveyor 1989 - 1992
- **Reederei Roth, GmbH, Hamburg** Chief Engineer Officer 1987 – 1989
- **Andrew Weir & Co. - the Bank Line Ltd.** Cadet Engineer to 2nd Engineer Officer 1975 – 1987



J.S. Poulson C.V. 2025

Education | Training | Professional Qualifications

- National Diploma Certificate in Marine Engineering, South Shields Marine & Technical College UK, awarded by The Institute of Marine Engineers & the UK Government Department of Education & Science.
- Sea-Going & Shore Based Training, Bank Line & South Shields Marine & Technical College.
- First Class Certificate of Competency: Marine Engineer Unlimited, issued by the UK Government Department of Transport (DOT).
- Lloyds Register of Shipping Classification Society, Certificate of Authorization - surveys by Chief Engineers.
- Surveyor Training Program & Examination, the Salvage Association London & Antwerp.
- Master of Science (MSc), Degree, University of Portsmouth, UK.
- Chartered Engineer (CEng) UK Engineering Council
- Chartered Marine Engineer (CMarEng): UK Engineering Council / Institute of Marine Engineering, Science and Technology

Professional Fellowships, Memberships & Affiliations

- Fellow, Institute of Marine Engineering Science & Technology (FIMarEST)
 - Member, IMarEST Ship Energy & Environment Committee.
 - Member, IMarEST Human Element Working Group Committee.
- Associate Member, the Association of Average Adjusters of the United States & Canada (Chairman of the Association of Average Adjusters of the United States year 2005 to 2006)
- Associate Member of the Maritime Law Association of the United States
- Accredited AIMU Hull & Machinery course instructor
- Member, American Boat & Yacht Council (ABYC)
- Past member, American Bureau of Shipping, Special Committee on Ship Operations
- Past member, Ship Technical Committee, International Group of P&I Clubs

Career Development

- GL Noble Denton: 'Leading with Integrity' - Certificate of Completion
- Bond Solon, London: 'Excellence in Written Evidence & Witness Familiarization'
- BMT Fleet Technologies: 'Fatigue and Fracture Analysis of Ship Structures' - Certificate of Completion; course presenter on 'Viewpoint of the Underwriters' Surveyor'
- North of England P&I Association: Residential Course in Loss Prevention and P&I Insurance - Pass with Distinction

Extracurricular Activities

- Volunteer Fire Fighter, Nassau County, NY



J.S. Poulson C.V. 2025

Expert Testimony

Expert written and oral deposition / trial testimony delivered in the following jurisdictions:

United States

- ~ New York, Southern District
- ~ New York, Eastern District
- ~ New York, State Supreme Court
- ~ New Jersey, District
- ~ Louisiana, Eastern District
- ~ Virginia, Eastern District
- ~ Michigan, Eastern District, Southern Division
- ~ Michigan, Western District, Northern Division
- ~ Pennsylvania, Eastern District
- ~ Connecticut, State Superior Court
- ~ Connecticut, District
- ~ Alabama, Southern District
- ~ Massachusetts Superior Court
- ~ Texas, Southern District

Expert written and oral trial testimony delivered in the following jurisdictions:

Canada

- ~ District of Montreal Superior Court, Province of Quebec
- ~ Federal Court of Canada, Toronto

UK

- ~ Admiralty Court, London

Panama

- ~ First Maritime Court of Panama

Arbitration Hearings

- ~ New York
- ~ Virginia
- ~ California
- ~ London

Mediations

- ~ New York
- ~ London

[Prior case filing details available as appropriate]



J.S. Poulson C.V. 2025

Publications & Presentations

- Alternative Marine Fuels; The Greening of Marine | Presentation to the biennial Seminar of the Board of Marine Underwriters San Francisco (BMUSF) and the American Institute of Marine Underwriters (AIMU) April 11, 2024
- General Average: Overview, Recent Trends & Challenges & The Impact of Potential Unseaworthiness | A joint presentation to the American Institute of Marine Underwriters, October 5, 2023
- Engine Room Fire Claims, Who's Really to Blame? | Presentation and Panel Moderator, Marine Claims International Conference, Dublin, September 28, 2023.
- General Average | Joint presentation to the Managers of the American P&I Club, May 3, 2023.
- Testing Times for Bunker Fuels | Presentation to Marine Claims International Conference, Dublin, September, 2022.
- The Future of Alternative Fuels and the Nuclear Option | Panel Member, Marine Insurance Americas conference New York, May 3, 2022.
- Human Error or Organizational Failure | the American P&I Club "Currents" No.42 periodical article, June 2019.
- Fuel Oil Challenges and 2020 | Presented at CMA Shipping Conference, Stamford, CT, April 2019.
- Fuel Oil Challenges and 2020 | Presented at Marine Insurance London Conference, London, March 2019.
- Bunkering – A Compendium | the American P&I Club Publication 2019
- Fuel Oil Challenges Under Marpol VI | Presented at join Safety & Sea Conference hosted by Resolve Marine and the American P&I Club, 2018.
- Fuel and FD&D | Presented to International Group of P&I Clubs, FD&D Managers Group, New York, NY, 2018.
- Ballast Water | Presented to the International Marine Claims Conference, Dublin 2017.
- Ever Feel Like a Spare Part | Presented to the International Marine Claims Conference, Dublin, 2016
- Transport Guidance for Steel Cargoes | the American P&I Club Contributing Editor, 2016.
- Man's Inhumanity to Machines | the American P&I Club Loss Prevention Circular, September 2016



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- E-Mission Control, We Have A Problem | pub; the American P&I Club “Currents” periodical article on the problems encountered with operation on fuels necessary to comply with impending environmental legislation.
- Design or Latent Defect | A comparison of coverage under English, German, Norwegian and U.S. Law | Joint Presentation to the International Marine Claims Conference – Dublin, 2013.
- The Deadliest Cargo | pub; The Nautical Institute periodical “Seaways” article on the dangers of the carriage of nickel ore cargoes 2013.
- Watery Graves | Presentation to the Association of Average Adjusters annual meeting & pub; the American P&I Club “Currents” periodical article on the dangers of the carriage of nickel ore cargoes 2013
- It Must be the Fuel | Presentation to the International Marine Claims Conference – Dublin, 2009.
- Life at the Sharp End | Presentation to the International Marine Claims Conference – Dublin, 2008.
- Human Error – the Challenges Facing Mariners Today | The International Union of Marine Insurance (IUMI) – Copenhagen conference address, 2007.
- Where Do We Go from Here? | “Chairman’s address - pub; the Association of Average Adjusters of the United States – 2006.
- Bilge Water Discharge – Still Hazy After All These Years | pub; the American P&I Club “Currents” periodical article.
- Hatch Covers – An Open & Shut Case (Fact Fiction & Fallacies) | pub; the American P&I Club “Currents” magazine articles.
- Fatigue & Fracture Analysis of Ship Structures | Guest Presenter Course material – “*The Viewpoint of the Underwriters Surveyor*” pub; British Maritime Technologies (BMT) – 2004
- Construction of Merchant Vessels in the U.S. | pub; Lloyds of London Press 2003

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August 7, 2025

Case No. PMC 25-1271 NPBL v. Carver Marine Towing

John S. Poulson, Prior 4 Years Testimony

- 1) In the case of MODA Ingleside Oils Terminal LLC vs. RIVERSIDE its engines, tackle, etc., *in rem et al.* United States District Court, Southern District of Texas. Deposition testimony.
- 2) In the case of Bertling Transgas Tankers S.A.C and Gard Marine & Energy Insurance (Europe) vs. Marine Engineers Corporation (Panama) Inc. First Maritime Court of Panama. Trial Testimony.
- 3) Re the complaint and petition of United Marine Offshore, LLC, Owner of the M/V MISS JULIE, her engines, tackle, Etc. In a cause of exoneration from or limitation of liability. In the United States District Court for the Southern District of Texas, Corpus Christi Division. Deposition testimony.
- 4) In the matter of Pan Ocean Co., Ltd., v. World Fuel Service (Singapore) PTE., Ltd., United States District Court, Southern District of Florida, Miami District. Deposition testimony.
- 5) In the matter of Omega Shipping Pte Ltd of Singapore v. World Fuel Service (Singapore) Pte Ltd. United States District Court, Southern District of Florida, Miami District. Deposition testimony.

A handwritten signature in black ink, appearing to read 'John S. Poulson', with a large, stylized initial 'J'.

**John S. Poulson MSc**  
CEng. CMarEng. FIMarEST.  
Chief Surveyor | CEO

PMC LLC  
998C Old Country Road No.183, Plainview New York 11803

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